

From: [Hardesty, Doug](#)
To: [Gent, Philip \(ECY\)](#)
Cc: [Skinnarland, Ron \(ECY\)](#); [Dossett, Donald](#)
Subject: RE: AOP schedule
Date: Friday, April 15, 2016 2:15:15 PM

Phil,
Monday will be fine. If you need more time than that, let me know, so I can keep HQ apprised. They are tracking this one closely.
We normally don't shorten our 45 day review period when there have been comments and there is a potential for challenge, to avoid any confusion about the deadline for the challenge. We can talk more about that when we get to that stage of the process.

Thanks for the update.

Doug Hardesty
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From: Gent, Philip (ECY) [<mailto:pgen461@ECY.WA.GOV>]
Sent: Friday, April 15, 2016 12:55 PM
To: Hardesty, Doug
Cc: Skinnarland, Ron (ECY)
Subject: Re: AOP schedule

Doug,

I have a phone conference with the attorneys at / today for about 9 of the comments. I'll get those resolved today and then work on cleaning it up. I would expect to get it to you Monday afternoon. It is the draft R2C and I have 10 days for your review. Then I'll incorporate comments from EPA and start the 45 day formal review (which I hope will be much shorter than 45 days).

Sent from my iPhone

On Apr 15, 2016, at 7:43 AM, Hardesty, Doug <Hardesty.Doug@epa.gov> wrote:

Phil,
I hate to bug you before the deadline which I assume is COB today, but just wondering whether we will see something today?
BTW, you did not include any time for EPA draft R2C review in your schedule. We will try to turn it around as quickly as possible.

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From: Gent, Philip (ECY) [<mailto:pgen461@ECY.WA.GOV>]
Sent: Wednesday, January 27, 2016 5:14 PM
To: Hardesty, Doug <Hardesty.Doug@epa.gov>
Cc: Martell, P John (DOH) <John.Martell@DOH.WA.GOV>; Schmidt, John W (DOH) <John.Schmidt@DOH.WA.GOV>
Subject: FW: AOP schedule

Doug,

Here is the tentative schedule for completion of the response to comments on AOP Revision B. I verbally discussed this with the Department of Health and their biggest concern is the February timeframe because they have a drill at the Columbia Generating Station (our local nuclear plant) and the training requirements they have for it.

Activity	Estimated Duration	Early Finish	Late Finish	Comments
Finish draft Response to Comments (R2C)	20 to 30 working days	2/26/16	3/11/16	1. DOH is supporting an ingestion exercise at Columbia Generating Station in February. This requires training and meetings that will compete for resources. 2. Ecology is still receiving NOCs that, by rule, take priority over the AOP. This requires resource allocation issues.
Provide draft R2C to Washington AAGs for review	10 working days	3/11/16	3/25/16	1. AAG support time for AOP review will be competing with NOC review support.
Incorporate any changes from AAG review	5 working days	3/18/16	4/1/16	
Provide draft R2C to EPA for review on response to Request to Object petition	10 working days	4/1/16	4/15/16	1. This review is specific to looking at the R2C from the stand point of response to the Petition to Object. 2. EPA will still have the formal 45-day review (see below), so this review is more specific to the granting of a portion of the Petition to Object.
Incorporate any changes from EPA review	5 working days	4/8/16	4/22/16	
Submit Proposed Permit and R2C to EPA for forty-five day review	45 calendar days	5/27/16	6/10/16	1. Formal review of the AOP and R2C 2. Likely will take 45 days when considering last request to object

Incorporate changes

5 working
days 6/3/16 6/17/2016

Issue Final Hanford AOP, Revision B

7/1/16 7/1/16

1. Issuance of the final AOP will occur on the start of a FFY quarter to facilitate tracking.
2. Early completion (e.g. 6/3/16) will still have an effective permit date of 7/1/16

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